



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1868

**FEB 22 2010**

Superintendent Sarah Olson  
National Park Service  
Roosevelt Vanderbilt National Historic Sites  
4097 Albany Post Road  
Hyde Park, NY 12538

Rating: LO-1

Dear Superintendent Olson:

The Environmental Protection Agency (EPA) has reviewed the draft General Management Plan and Environmental Impact Statement (draft GMP/EIS) issued by the National Park Service, Department of Interior (NPS/DOI) for the Roosevelt-Vanderbilt National Historic Sites, New York (CEQ # 20090438). This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709), the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's regulations for implementing NEPA (40 CFR Parts 1500-1508).

The draft GMP/EIS analyzed the potential environmental impacts over the next 20 years of the proposed general management plan for the National Historic Sites. The analysis assesses three alternatives, including the no action alternative. The proposed alternative is intended to make the sites relevant to more audiences by encouraging greater civic participation in park activities while significantly enhancing the historic character of park resources. The proposed alternative covers the three units of the National Park System that comprise Roosevelt-Vanderbilt National Historic Site: the Franklin D. Roosevelt National Historic Site; the Eleanor Roosevelt National Historic Site, and the Vanderbilt Mansion National Historic Site. The primary issues include preservation and treatment of cultural resources, provision of visitor services, and partnership opportunities.

EPA's comments are below:

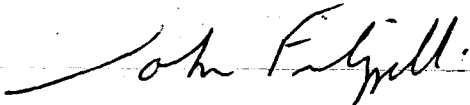
- Based on the information in the draft GMP/EIS, EPA would like to use this opportunity to encourage the National Park Service and the contractors on this project to implement green practices and techniques during the design and operation of the project. For example, Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product and would be an excellent approach to maintaining the historic look and feel of the park.  
<http://www.epa.gov/nps/lid/>

- Air emissions from diesel vehicles and equipment during operation and construction will include particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>). To reduce the potential health and environmental impacts of these pollutants in the park area and to improve the conditions for workers, the installation of diesel particulate filters (DPF) on construction equipment should be considered. DPFs can reduce diesel particulate emissions by 90 percent for stationary and non-stationary diesel equipment. To learn more about this technology and its application, you may reference DPFs at <http://www.epa.gov/oms/retrofit/nonroad-list.htm> or contact us directly.
- Several building and operations features offering multiple benefits, including energy efficiency, water conservation, and healthy indoor air quality, should be considered during renovations. Applying building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense can significantly reduce the environmental footprint of the park. The following link identifies and explains these opportunities. <http://www.energystar.gov/>.
- To meet electrical needs during construction and operation, EPA recommends obtaining electricity from alternative and/or renewable sources. The U.S. Department of Energy offers the newly developed Renewable Energy Incentive Program. The program provides incentives and support services needed for participants to build renewable energy projects using solar, wind and biopower technologies. In addition, the Department of Energy's "Green Power Network" (GPN) provides information, markets and technical assistance that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy in New York:  
[http://apps3.eere.energy.gov/greenpower/buying/buying\\_power.shtml?state=NY](http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NY).

Based on our review, we have rated this draft GMP/EIS as LO-1 indicating Lack of Objection - Adequate Information. Enclosed are a rating system sheet and some additional greening recommendations that may be applicable to this project.

Thank you for the opportunity to comment on the DEIS. If you have any questions, please call Charles Harewood of my staff at (212) 637-3753.

Sincerely yours,



John Filippelli, Chief  
Strategic Planning and Multi-Media Programs Branch

Enclosures

**SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION**  
**Environmental Impact of the Action**

**LO-Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC-Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

**EO-Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU-Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1-Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2-Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**Category 3-Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analysis, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

## U.S. EPA Region 2 Green Recommendations<sup>1</sup>

### Recommendations:

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

- **ENERGY STAR/Multi-media green building and land design practices**  
Require green building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for stimulus funded building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).  
<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=64>  
[http://www.energystar.gov/index.cfm?c=business.bus\\_bldgs](http://www.energystar.gov/index.cfm?c=business.bus_bldgs)  
[http://www.energystar.gov/index.cfm?c=bldrs\\_lenders\\_raters.nh\\_iap](http://www.energystar.gov/index.cfm?c=bldrs_lenders_raters.nh_iap)
- **Encourage water conservation in building construction**  
Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. <http://www.epa.gov/watersense/water/fed-agency.htm>
- **Encourage Low Impact Development to help manage storm water**  
Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product.  
<http://www.epa.gov/nps/lid/>
- **Alternative and Renewable Energy**  
The Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy. [http://apps3.eere.energy.gov/greenpower/buying/buying\\_power.shtml?state=NJ](http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NJ)

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<sup>1</sup> "Green" here means environmentally sound practices in general and is not equivalent to the specific "green infrastructure" requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

- Ensure clean diesel practices**  
 Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:

  - 1) Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
  - 2) Use of ultra low sulfur diesel fuel in nonroad applications ahead of the mandate; and
  - 3) Use of the cleanest engines either through add-on control technologies like diesel oxidation catalysts and particulate filters, repowers, or newer, cleaner equipment

Encourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines):  
<http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>  
 Additional Information: <http://www.epa.gov/diesel/construction/contract-lang.htm>  
 How to guide: <http://www.mass.gov/dep/air/diesel/conetro.pdf>
- Promote the use of recycled materials in highway and construction projects**  
 Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications. <http://www.recycledmaterials.org/tools/uguidelines/index.asp>  
<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>  
<http://www.epa.gov/osw/conserva/rrr/imr/index.htm>
- Encourage safe reuse and recycling of construction wastes**  
 Promote reuse and recycling at the 50% (by weight) level for building, road, and bridge project construction and demolition debris wastes. The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification.  
[http://www.wbdg.org/design/greenspec\\_msl.php?s=017419](http://www.wbdg.org/design/greenspec_msl.php?s=017419)
- Encourage sustainable storm water management at building sites**  
 Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.  
[http://cfpub.epa.gov/npdes/home.cfm?program\\_id=298](http://cfpub.epa.gov/npdes/home.cfm?program_id=298)  
 Consider designs for storm water management on compacted, contaminated soils in dense urban areas:  
<http://www.epa.gov/brownfields/publications/swdp0408.pdf>
- Encourage cost-efficient, environmentally friendly landscaping**  
 EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use. <http://www.epa.gov/osw/conserva/rrr/greenscapes/index.htm>
- Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**  
 Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.)  
[http://www.epa.gov/waterinfrastructure/bettermanagement\\_energy.html](http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html)

- **Encourage land development in brownfield and infill sites**  
Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often “infrastructure-ready,” eliminating the need to build new roads and utility lines which are necessary in undeveloped land.  
<http://www.epa.gov/brownfields/>
- **Use the Integrated Design process on building developments**  
Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process.  
[http://www.wbdg.org/design/engage\\_process.php](http://www.wbdg.org/design/engage_process.php)
- **Encourage use of Smart Growth and transit oriented development principles**  
Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are walkable and located near public transit.  
<http://www.epa.gov/smartgrowth>
- **Ensure environmentally preferable purchasing**  
Promote markets for environmentally preferable products by referencing EPA’s multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>
- **Purchase ‘green’ electronics, and measure their benefits**  
Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool ([www.epeat.net](http://www.epeat.net)). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO<sub>2</sub> emission reductions, and other environmental benefits achieved by the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator (<http://eerc.ra.utk.edu/ccpct/eebc/eebc.html>).
- **Incorporate greener practices into remediation of contaminated sites**  
Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use. <http://clu.in.org/greenremediation/index.cfm>